

[If you need additional space for ANY section, please attach an additional sheet and reference that section.]

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS

FILED

APR 04 2025

THOMAS G. BRUTON
CLERK, U.S. DISTRICT COURT

JACQUELINE DUNN

Plaintiff(s),

Case Number: _____

v. Palmer House, A Hilton Hotel.

Hilton Worldwide Headquarters.

Defendant(s).

1:25-cv-03657

Judge Coleman

Mag. Judge Weisman

RANDOM / CAT.2

COMPLAINT OF EMPLOYMENT DISCRIMINATION

1. This is an action for employment discrimination.

2. The plaintiff is Jacqueline Dunn of the
county of Cook in the state of Illinois.

3. The defendant is Palmer House, A Hilton Hotel., whose
street address is 17 E. Monroe St. (+ Hilton Headquarters McLean, VA)
(city) Chicago (county) Cook (state) IL (ZIP) 60617
(Defendant's telephone number) 312-726-7500

4. The plaintiff sought employment or was employed by the defendant at (street address)

17 E. Monroe Street (city) Chicago
(county) Cook (state) IL (ZIP code) 60617

[If you need additional space for ANY section, please attach an additional sheet and reference that section.]

5. The plaintiff [**check one box**]

- (a) ☐ was denied employment by the defendant.
- (b) ☒ was hired and is still employed by the defendant. (almost 26 years.)
- (c) ☐ was employed but is no longer employed by the defendant.

6. The defendant discriminated against the plaintiff on or about, or beginning on or about, (month) June, (day) _____, (year) 2019, to the present 2025.

7.1 (**Choose paragraph 7.1 or 7.2, do not complete both.**) (8 years, Kathryn D. Manager) + Indira Perovic (dir.)

- (a) The defendant is not a federal governmental agency, and the plaintiff [check one box] ☒ has ☐ has not filed a charge or charges against the defendant

asserting the acts of discrimination indicated in this complaint with any of the following government agencies:

- (i) ☒ the United States Equal Employment Opportunity Commission, on or about

(month) September (day) 9, (year) 2024.

- (ii) ☐ the Illinois Department of Human Rights, on or about

(month) _____ (day) _____ (year) _____.

- (b) If charges were filed with an agency indicated above, a copy of the charge is attached. ☒ Yes, ☐ No, but plaintiff will file a copy of the charge within 14 days.

It is the policy of both the Equal Employment Opportunity Commission and the Illinois Department of Human Rights to cross-file with the other agency all charges received. The plaintiff has no reason to believe that this policy was not followed in this case.

7.2 The defendant is a federal governmental agency, and

- (a) the plaintiff previously filed a Complaint of Employment Discrimination with the

[If you need additional space for ANY section, please attach an additional sheet and reference that section.]

[If you need additional space for ANY section, please attach an additional sheet and reference that section.]

defendant asserting the acts of discrimination indicated in this court complaint.

☐ Yes (month)_____ (day)_____ (year) _____

☐ No, did not file Complaint of Employment Discrimination

(b) The plaintiff received a Final Agency Decision on (month)_____
(day) _____ (year) _____.

(c) Attached is a copy of the

(i) Complaint of Employment Discrimination,

☐ Yes ☐ No, but a copy will be filed within 14 days.

(ii) Final Agency Decision

☐ Yes ☐ NO, but a copy will be filed within 14 days.

8. (Complete paragraph 8 only if defendant is not a federal governmental agency.)

(a) ☐ the United States Equal Employment Opportunity Commission has not
issued a *Notice of Right to Sue*.

(b) ☒ the United States Equal Employment Opportunity Commission has issued
a *Notice of Right to Sue*, which was received by the plaintiff on
(month) January (day) 6, (year) 2025 a copy of which
Notice is attached to this complaint.

9. The defendant discriminated against the plaintiff because of the plaintiff's [*check only those that apply*]:

(a) ☒ Age (Age Discrimination Employment Act). *Trying to fire me or make me quit before I can retire.*
(b) ☐ Color (Title VII of the Civil Rights Act of 1964 and 42 U.S.C. §1981).

[If you need additional space for ANY section, please attach an additional sheet and reference that section.]

[If you need additional space for ANY section, please attach an additional sheet and reference that section.]

- (c) ☐ Disability (Americans with Disabilities Act or Rehabilitation Act)
- (d) ☐ National Origin (Title VII of the Civil Rights Act of 1964 and 42 U.S.C. §1981).
- (e) ☒ Race (Title VII of the Civil Rights Act of 1964 and 42 U.S.C. §1981).
- (f) ☐ Religion (Title VII of the Civil Rights Act of 1964)
- (g) ☐ Sex (Title VII of the Civil Rights Act of 1964)
- } Trying to fire 4 operators with seniority. — Afri. Amer. black women.
10. If the defendant is a state, county, municipal (city, town or village) or other local governmental agency, plaintiff further alleges discrimination on the basis of race, color, or national origin (42 U.S.C. § 1983). ~~XXXX~~
11. Jurisdiction over the statutory violation alleged is conferred as follows: for Title VII claims by 28 U.S.C. §1331, 28 U.S.C. §1343(a)(3), and 42 U.S.C. §2000e-5(f)(3); for 42 U.S.C. §1981 and §1983 by 42 U.S.C. §1988; for the A.D.E.A. by 42 U.S.C. §12117; for the Rehabilitation Act, 29 U.S.C. § 791.
12. The defendant [*check only those that apply*]
- (a) ☐ failed to hire the plaintiff.
- (b) ☐ terminated the plaintiff's employment.
- (c) ☐ failed to promote the plaintiff.
- (d) ☐ failed to reasonably accommodate the plaintiff's religion.
- (e) ☐ failed to reasonably accommodate the plaintiff's disabilities.
- (f) ☒ failed to stop harassment;
- (g) ☒ retaliated against the plaintiff because the plaintiff did something to assert rights protected by the laws identified in paragraphs 9 and 10 above;
- (h) ☒ other (specify): 2022-2025 Sprayed, exposed me to harmful dangerous chemicals, — causing me injuries, pain + suffering. emotional distress, ... forced overtime. increased workload. stalking, fake "poor work performance" writeups + suspension. — slander. computer/work sabotage, denying my seniority in work schedules, ...

[If you need additional space for ANY section, please attach an additional sheet and reference that section.]

[If you need additional space for ANY section, please attach an additional sheet and reference that section.]

Intentionally caused me pain and stiffness in my back, pain in my legs, a deep irritation in my throat, constant coughing/coughing fits. recurring problems with my back & voice/throat, ... — a Reckless disregard for my health and safety.

13. The facts supporting the plaintiff's claim of discrimination are as follows: For years—

I constantly reported harassment to ~~department~~ hotel managers and HR. — nothing was done. I even reported bullies/managers and other operators to the police and the FBI. (I have one witness who witnessed 1 person spraying something in the department.) Tried to destroy my health to put me out of my job, or make me quit, before I can retire..

14. [AGE DISCRIMINATION ONLY] Defendant knowingly, intentionally, and willfully discriminated against the plaintiff. Trying to fire me, before I can retire.

15. The plaintiff demands that the case be tried by a jury. ☒ Yes ☐ No

16. THEREFORE, the plaintiff asks that the court grant the following relief to the plaintiff [check only those that apply]

- (a) ☐ Direct the defendant to hire the plaintiff.
- (b) ☐ Direct the defendant to re-employ the plaintiff.
- (c) ☐ Direct the defendant to promote the plaintiff.
- (d) ☐ Direct the defendant to reasonably accommodate the plaintiff's religion.
- (e) ☐ Direct the defendant to reasonably accommodate the plaintiff's disabilities.

- (f) ☒ Direct the defendant to (specify): Tell me the chemicals/poisons that I was exposed to and what damages it causes to my future health.

[If you need additional space for ANY section, please attach an additional sheet and reference that section.]

[If you need additional space for ANY section, please attach an additional sheet and reference that section.]

{ Lost wages... (I wanted to work more years.)
 Compensatory damages, $\$60,000 \times 5 = \$300,000$.
 Punitive damages for chemical exposure, damage to my
 health, future health care costs/expenses, ^{lost} years of stress/stander,
 harassment + ...

- (g) ☒ If available, grant the plaintiff appropriate injunctive relief, lost wages, liquidated/double damages, front pay, compensatory damages, punitive damages, prejudgment interest, post-judgment interest, and costs, including all reasonable attorney fees and expert witness fees. defendant pays all attorney fees...
- (h) ☒ Grant such other relief as the Court may find appropriate.

Please hold this company accountable for their hostile dangerous, stressful work environment.

Harassment is still happening.
They will not stop.

Jacqueline Dunn
(Plaintiff's signature)

Jacqueline Dunn
(Plaintiff's name)

8341 S. Yates
(Plaintiff's street address)

(City) Chicago (State) IL (ZIP) 60617

(Plaintiff's telephone number) (773) -721-9690 / 312-833-0901
home # / cell #

Date: April 2, 2025

For their crazy ridiculous behavior, (bullying/harassment/poisoning)
 2 Communications dept. managers, Indira Perovic and
 Kathryn Onyegemba
 3 Comm. Dept. operators, Faye Smith, Marvin Sutherland and
 Shaunta Gunn
 all 5 should be fired immediately.

[If you need additional space for ANY section, please attach an additional sheet and reference that section.]



U.S. EQUAL EMPLOYMENT OPPORTUNITY COMMISSION

Chicago District Office
230 S Dearborn Street
Chicago, IL 60604
(800) 669-4000
Website: www.eeoc.gov

DETERMINATION AND NOTICE OF RIGHTS

(This Notice replaces EEOC FORMS 161, 161-A & 161-B)

Issued On: 10/28/2024

To: Jacqueline Dunn
8341 S Yates
Chicago, IL 60617
Charge No: 440-2024-11982

EEOC Representative and email: FATIMA SANDOVAL
Investigator
fatima.sandoval@eeoc.gov

DETERMINATION OF CHARGE

The EEOC issues the following determination: The EEOC will not proceed further with its investigation and makes no determination about whether further investigation would establish violations of the statute. This does not mean the claims have no merit. This determination does not certify that the respondent is in compliance with the statutes. The EEOC makes no finding as to the merits of any other issues that might be construed as having been raised by this charge.

NOTICE OF YOUR RIGHT TO SUE

This is official notice from the EEOC of the dismissal of your charge and of your right to sue. If you choose to file a lawsuit against the respondent(s) on this charge under federal law in federal or state court, **your lawsuit must be filed WITHIN 90 DAYS of your receipt of this notice.** Receipt generally occurs on the date that you (or your representative) view this document. You should keep a record of the date you received this notice. Your right to sue based on this charge will be lost if you do not file a lawsuit in court within 90 days. (The time limit for filing a lawsuit based on a claim under state law may be different.)

If you file a lawsuit based on this charge, please sign in to the EEOC Public Portal and upload the court complaint to charge 440-2024-11982.

On behalf of the Commission,

Digitally Signed By: Amrith Kaur Aakre
10/28/2024

Amrith Kaur Aakre
District Director

(received January 6, 2025)

Cc:

**Andrew J Schuyler
Jackson Lewis P.C.
150 N Michigan Ave Ste 2500
Chicago, IL 60601**

**Ashley Cypher
Hilton Worldwide Headquarter
7930 Jones Branch Drive
Mc Lean, VA 22102**

**Richard Mrizek
Jackson Lewis P.C.
150 N Michigan Ave Ste 2500
Chicago, IL 60601**

Please retain this notice for your records.



U.S. EQUAL EMPLOYMENT OPPORTUNITY COMMISSION

CHARGE OF DISCRIMINATION

For Official Use Only - Charge Number
440-2024-11982

EEOC Form 5A (Sept. 1, 2017)

EEOC Received 09/09/2024

Personal Information	First Name: <u>Jacqueline</u> MI: _____ Last Name: <u>Dunn</u> Address: <u>8341 S. Yates</u> Apt.: _____ City: <u>Chicago</u> County: <u>Cook</u> State: <u>IL</u> Zip Code: <u>60617</u> Phone: <u>773-721-7990</u> Home <input type="checkbox"/> Work <input type="checkbox"/> Cell <input type="checkbox"/> Email Address: <u>jucydunn17@gmail.com</u> home cell <u>312-933-0901</u>
Who do you believe discriminated against you?	Employer <input checked="" type="checkbox"/> Union <input type="checkbox"/> Employment Agency <input type="checkbox"/> Other Organization <input type="checkbox"/> Organization Name: <u>Palmer House Hilton</u> Address: <u>17 E. Monroe</u> Suite: _____ City: <u>Chicago</u> State: <u>IL</u> Zip Code: <u>60603</u> Phone: <u>312-726-7500</u>
Why you believe you were discriminated against?	Age <input checked="" type="checkbox"/> Color <input type="checkbox"/> Disability <input type="checkbox"/> Genetic Information <input type="checkbox"/> National Origin <input type="checkbox"/> Race <input type="checkbox"/> Religion <input type="checkbox"/> Retaliation <input checked="" type="checkbox"/> Sex <input type="checkbox"/>
What happened to you that you believe was discriminatory?	Date of most recent job action you believe was discriminatory: _____ Describe briefly <u>each job action you believe was discriminatory</u> and when it happened (estimate). <u>8 incidents. —</u> <u>See attached list.</u> <u>(and paperwork).</u>
Signature and Verification	I understand this charge will be filed with both the EEOC and the State or local Agency, if any. I will advise the agencies if I change my address, phone, or email. I will cooperate fully with them in the processing of my charge in accordance with their procedures. I understand by signing below that I am filing a charge of employment discrimination with the EEOC. I understand that the EEOC is required by law to give a copy of the charge, which includes my name, to the organization named above. I also understand that the EEOC can only investigate charges of job discrimination based on Age, Color, Disability, Genetic information, National Origin, Religion, Sex, or based on retaliation for: filing a charge of employment discrimination; helping in someone else's complaint about job discrimination; or complaining to the employer about job discrimination. I declare under penalty of perjury that the above is true and correct. Signature: <u>Jacqueline Dunn</u> Date: <u>Sept. 9, 2024</u>

Incidents

8 incidents reported to Human Resources manager and Hotel managers (+ union):

- (1) March 9, 2024 manager Kathryn Onyiah is constantly making me complete 1st shift work from the guest orders screen (Hotels system), when I arrive at work and erasing my emails so I can't have a record copy of my work done and completed. This is work sabotage, discrimination...
- (2) May 3, 2024 I was written up for not doing my end of shift checklist in the computer. I believe the computers were sabotaged, tampered with so I could not do this checklist. This never happened before. I believe this was done by manager Kathryn O. (and operator marvin Sutherland). This was a set-up to write me up, suspend me + get me fired from my job.
- (3) May 4, 2024 I was written up for "poor job performance" because guest requests were not done/completed during the 1st shift. I work 2nd shift. I started work at 2pm. This write up was completely made up, lies, slander, I do my job, all job duties.
- (4) June 12, 2024 I was singled out and reprimanded for not leaving my property in my locker. I have not used my locker for about 2 years. After operators have many bags and stuff all over the place. I was the only operator asked why I have my property with me. This was just making up some kind of intimidation, to accuse me of not following instructions.

⑤ June 14, 2024 I was written up and suspended for "poor work performance". This was not real. I believe manager Kathryn O. set this incident up, to write me up, to suspend me & to fire me. This caller performed on the phone, it was obviously intentional. I do my job - I have never been accused of poor work performance and never suspended until Kathryn. in 25 years of working at the Palmer House. Kathryn O. & Indira P. are obsessed with trying to fire me.

⑥ June 29, 2024 manager Kathryn O. & operator Taya Smith poisoned me. I believe a chemical was sprayed on my seat cushion, desk, computer, ... This has happened before. I was fine/feeling well when I arrived at work - then I felt sick and in pain. I have reported operator Taya Smith to hotel managers before for spraying something in the Communications department. (I reported this twice to the FBI.)

⑦ July 12, 2024 start of my shift, I could not log onto the guest requests Hots system. Someone changed my log in name without my knowledge or consent. I noticed work being changed and done incorrectly in my name. This was serious work sabotage and a setup to get me written up again and fired. Only a manager could do this. I believe it was manager Kathryn O. & Indira P.

⑧ July 12, 2024 I was written up again for "poor work performance", after a guest complaint. I did my job and I did not do anything wrong. This write up again was lies and glander, make up to infringe me. No one else has been written up for sitting on the phone.



MONTHLY SAFETY & SECURITY TRAINING HANDOUT

MARCH | Hazcom



Introduction







OSHA's Hazard Communication Standard (HCS) is based on a simple concept—that employees have both a need and a right to know the hazards and identities of the chemicals they are exposed to when working. They also need to know what protective measures are available to prevent adverse effects from occurring. The HCS is designed to provide employees with the information they need to know. Knowledge acquired under the HCS will help employers provide safer workplaces for their employees. When employees have information about the chemicals being used, they can take steps to reduce exposures, substitute less hazardous materials, and establish proper work practices. These efforts will help prevent the occurrence of work-related illnesses and injuries caused by chemicals.

Safety Data Sheets and Chemical Inventories

Safety Data Sheets (SDS) are developed by the chemical manufacturer to provide information concerning safe use of the product. They provide workers and emergency personnel with information about physical properties (melting point, boiling point, flash point, etc.), toxicity, health effects, first aid measures, reactivity, storage, disposal, protective equipment, and spill-handling procedures. SDSs are required by law to be readily available for every hazardous chemical at each worksite along with an up to date chemical inventory. See your department manager or the hotel's safety representative if you are unsure where to find a Safety Data Sheet.

GHS Pictograms and Hazard Classes

The recently updated Hazard Communication Standard (HCS) requires that certain pictograms be included on manufacturer and supplier labels of chemical containers to warn you of potential hazards of exposure. The pictograms on the right are part of the new Globally Harmonized System (GHS) of Classification and Labeling of Chemicals.

GHS - Hazard Pictograms and Related Hazard Classes		
		
Expanding Bomb • Explosives • Self-reactives • Organic Peroxides	Corrosion • Skin corrosion/burns • Eye damage • Corrosive to metals	Flame Over Circle • Oxidizing gases • Oxidizing liquids • Oxidizing solids
		
Gas Cylinder • Gases under pressure	Environment • Aquatic toxicity	Skull & Crossbones • Acute toxicity (fatal or toxic)
		
Exclamation Mark • Irritant (eye & skin) • Skin sensitizer • Acute toxicity • Narcotic effects • Respiratory tract irritant • Hazardous to ozone layer (non-mandatory)	Health Hazard • Carcinogen • Mutagenicity • Reproductive toxicity • Respiratory sensitizer • Target organ toxicity • Aspiration toxicity	Flame • Flammables • Pyrophorics • Self-heating • Emits flammable gas • Self-reactives • Organic peroxides



L X R

CONRAD

canopy

CURIO
COLLECTIONTAPESTRY
COLLECTION

MOITO

Hilton
Garden InnHOMEWOOD
SUITESHOME
SUITES